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EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EQUAL EMPLOYMENT OPPORTUNITY)	CIVIL ACTION NO. C-07-3944 (SBA)
COMMISSION,)	
)	ORDONIO-DIXON DECLARATION
Plaintiff)	
)	
v.)	Courtroom: 3, 3 rd Fl. (Oakland)
)	Judge: Hon. Sandra B. Armstrong
GEORGIA-PACIFIC CORRUGATED,)	
LLC,)	
)	
Defendant.)	
_____)	

I, LINDA ORDONIO-DIXON declare that I am a person over the age of eighteen, competent to testify to the following matters within my personal knowledge:

1. I am an attorney for plaintiff United States Equal Employment Opportunity Commission (EEOC), and in that capacity I am charged with the litigation of the instant suit. As such, I am personally familiar with the events and documents associated with the litigation of this case.

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Attachment

From: "Edwards, Margaret" <MHEdwards@littler.com>
To: "LINDA ORDONIO-DIXON" <LINDA.ORDONIO-DIXON@EEOC.GOV>
Date: 4/4/2008 9:10:46 PM
Subject: RE: Stege Deposition

We are not willing to go forward without knowing Ms. Stege's status, and it does make a difference. Nor do we agree that Ms. Dickson has the same status, when Ms. Stege is not a plaintiff. The deposition will not go forward on Monday. Please give me alternate dates later in April or in May.

I do not know yet whether we will have to seek a postponement of the mediation, but that seems a distinct possibility.

Margaret

Margaret Hart Edwards, Esq.
Senior Shareholder
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From: LINDA ORDONIO-DIXON [mailto:LINDA.ORDONIO-DIXON@EEOC.GOV]
Sent: Friday, April 04, 2008 10:46 AM
To: Edwards, Margaret
Cc: kathy@dicksonross.com
Subject: Re: Stege Deposition

Hi Margaret, I don't believe the Court's ruling makes a difference as to the taking of Janet's deposition. Janet's state claims arise out of the same set of facts as the federal claims in this case and Kathy, as Janet's private attorney, has the right to attend the depo. In any event, I am not available on the 21st or 22nd and there are no days in the week of April 14th on which Kathy and I are both available. If Janet's depo is to be taken before the mediation on the 24th, we need to go forward on Monday. Please let us know what you decide as soon as possible. Thanks, Linda

>>> "Edwards, Margaret" <MHEdwards@littler.com> 4/3/2008 3:54 PM >>>

Dear Linda,

As the court has taken the motion to intervene under submission, and we have no ruling, we believe that it would be premature to proceed with the deposition of Ms. Stege on Monday and Tuesday of next week. I'd like to propose that we try to reschedule the deposition for April 21 and 22, in the hope that we have a ruling by then, one way or the other, and we can get the deposition before the mediation on April 24, 2008. Will those dates work for you? If not, please give me alternative dates.

I assume that you will coordinate with Ms. Dickson, as Stege is not formally a plaintiff in the case.

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CC: <kathy@dicksonross.com>